

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

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MALCOLM ROSENWALD,

Plaintiff,

v.

LAURA S. UNGER, BENJAMIN R.
CIVILETTI, WILLIAM H. JEWS, JAMES
H. BERICK, MARY H. BOIES, BRUCE L.
HAMMONDS, RANDOLPH C. LERNER,
STUART L. MARKOWITZ, WILLIAM H.
MILSTEAD and THOMAS G.
MURDOUGH, JR.,

Defendants,

MBNA CORPORATION,

Nominal Defendant.
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Civil Action No. 05 CV 02296 CCB

**DECLARATION OF TROY PRIEST IN SUPPORT OF DEFENDANTS'
MOTION TO TRANSFER THIS ACTION TO THE DISTRICT OF
DELAWARE OR, IN THE ALTERNATIVE, TO STAY THIS ACTION**

TROY PRIEST declares as follows:

1. I am a member of the firm Brown & Sheehan, LLP, counsel for nominal defendant MBNA Corporation and defendant Bruce L. Hammonds. I make this declaration in support of Defendants' Motion to Transfer This Action to the District of Delaware or, in the Alternative, to Stay This Action.

2. Attached hereto as Exhibit A is a true and correct copy of the complaint in *Baker v. MBNA Corp.*, No. 1:05-CV-00272-GMS (D. Del. filed May 5, 2005).

3. Attached hereto as Exhibit B is a true and correct copy of the complaint in *Phillips v. MBNA Corp.*, No. 1:05-CV-00277-GMS (D. Del. filed May 9, 2005).

4. Attached hereto as Exhibit C is a true and correct copy of the complaint in *Wilkins v. MBNA Corp.*, No. 1:05-CV-00287-GMS (D. Del. filed May 12, 2005).

5. Attached hereto as Exhibit D is a true and correct copy of the complaint in *Bronstein v. MBNA Corp.*, No. 1:05-CV-00289-GMS (D. Del. filed May 13, 2005).

6. Attached hereto as Exhibit E is a true and correct copy of the complaint in *Penn v. MBNA Corp.*, No. 1:05-CV-00293-GMS (D. Del. filed May 13, 2005).

7. Attached hereto as Exhibit F is a true and correct copy of the complaint in *Jones v. MBNA Corp.*, No. 1:05-CV-00316-GMS (D. Del. filed May 20, 2005).

8. Attached hereto as Exhibit G is a true and correct copy of the complaint in *Blum v. MBNA Corp.*, No. 1:05-CV-00372-GMS (D. Del. filed June 8, 2005).

9. Attached hereto as Exhibit H is a true and correct copy of the complaint in *Cussen v. MBNA Corp.*, No. 1:05-CV-00389-UNA (D. Del. filed June 13, 2005).

10. Attached hereto as Exhibit I is a true and correct copy of the complaint in *Cannon v. MBNA Corp.*, No. 05-426-GMS (D. Del. filed June 24, 2005).

11. Attached hereto as Exhibit J is a true and correct copy of the amended complaint in *Lemon Bay Partners LLP v. Hammonds*, No. 1:05-CV-00327-GMS (D. Del. filed July 6, 2005).

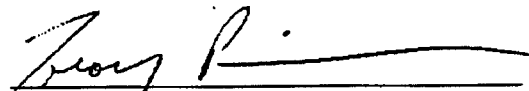
12. Attached hereto as Exhibit K is a true and correct copy of the amended complaint in *Benoit v. Hammonds*, No. 1:05-CV-00361-GMS (D. Del. filed June 6, 2005).

13. Attached hereto as Exhibit L is a true and correct copy of the Stipulated Proposed Order Consolidating Actions and Appointing Co-Lead Counsel submitted in *Lemon Bay Partners LLP v. Hammonds*, No. 1:05-CV-00327-GMS (D. Del.), and *Benoit v. Hammonds*, No. 1:05-CV-00361- GMS (D. Del.), on August 23, 2005.

14. Attached hereto as Exhibit M is a true and correct copy of the current Docket in *Lemon Bay Partners LLP v. Hammonds*, No. 1:05-CV-00327-GMS (D. Del.), showing that the stipulated order referred to in paragraph 13 was entered on August 25, 2005.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed: August 26, 2005


Troy Priest